

REMARKS**I. Overview**

Claims 1-39 are pending. Applicant has amended claims 1, 12, 23, and 32.

II. Prior Art Rejections

The Examiner rejected the claims in accordance with the following table. Applicant respectfully traverses these rejections below.

Section	Claims	Reference(s)
35 U.S.C. § 103(a)	1-8, 11-14, and 19-39	Ronen (6,026,441) and Eftis (7,171,473)
35 U.S.C. § 103(a)	9-10 and 15-18	Ronen, Eftis, and Anderson(5,974,453)

Ronen describes a method for establishing communication on the Internet with a client having a dynamically assigned Internet Protocol (IP) address. Ronen requires that the connecting user know the email address of the target user, and performs a two step process to identify the target user's IP address. First, Ronen uses DNS to lookup an address for the target user's Internet Service Provider (ISP) using the domain portion of the target user's email address. Then, Ronen uses a custom protocol to provide the email address to the ISP and request that the ISP return the target user's current dynamic address. The process described by Ronen requires that the client send two requests to determine the target user's current address, and cannot be used with existing Internet services without modifying those services to send the additional custom request.

Eftis describes a system that uses the HyperText Transport Protocol (HTTP) to maintain and update on-line presence information for a user. A static Uniform Resource Locator (URL) is associated with each user. When a connecting user wants to communicate with a target user, the connecting user provides the HTTP URL for the target user to a custom service that responds with information about the target user's IP, port, and other session information. Eftis does not describe sending a single DNS request to identify a current network address for a target user, and cannot be used with existing

Internet services without modifying those services to communicate with the customer service using the HTTP URL.

In contrast, Applicant's technology receives a standard DNS request from a client and responds with a dynamic network address where a target user can be reached. Because applicant's technology communicates with the client using standard DNS, the client need not be modified to handle users with dynamic network addresses. Thus, applicant's technology can be used with existing Internet services such as HTTP, FTP, Telnet, and so forth. Applicant's technology associates domain names with an intermediate identifier that is provided to a DNS server. Upon receiving a request to translate a domain name into a network address, the DNS server first translates the domain name to the intermediate identifier, and then sends a request to an external dynamic address system to translate the intermediate identifier to a network address. The DNS server receives a response from the dynamic address system and then responds to the original request with the network address. In addition, the dynamic address system is typically a system that a user already interacts with and to which the user already has provided a current network address. For example, users of an instant messaging system typically sign-on to the system and provide a current network address so that other users can send instant messages to the user's network address. By utilizing a server that is already aware of the user's current network address, Applicant's technology can provide a regularly updated address for directing communications to the user without requiring the user to perform additional steps to update the DNS server every time their address changes.

Each of applicant's claims recites receiving a single DNS request from a client and providing a dynamic network address to the client in response. Claims 1-11 recite "such that the client receives the current network address associated with the user by sending a single DNS request to the computer system." Claims 12-22 recite "such that the domain name server can respond to the client and the client receives the network address by sending a single DNS request to the computer system." Claims 23-31 recite "the client

receives the identified network address associated with the name by sending a single DNS request to the computer system." Claims 32-39 recite "such that a client receives the network address associated with the resource by sending a single DNS request to the computer system." Neither Ronen nor Eftis teaches or suggests this element of applicant's claims. Ronen describes a system that requires the client to send two requests to determine the network address of a target user, one of which is a custom request that cannot be used without modifying the client. In fact, Ronen teaches away from applicant's method by stating that DNS cannot be used in the manner used by applicant, "the IP address of client terminal 105 cannot be provided by DNS 111 since DNS 111 does not have a record of temporary IP address assignments." Ronen, col. 3:47-49. In applicant's system, DNS is able to provide access to temporary IP address assignments. Similarly, although Eftis uses HTTP as a transport protocol, Eftis uses a custom protocol on top of HTTP to request and receive session information about a user. Thus, Eftis works only with those services that have been modified to understand the custom protocol. None of the references cited by the Examiner describes receiving a single DNS request from a client and providing a dynamic network address to the client in response. Therefore, Applicant's claims are patentable over these references. Accordingly, Applicant respectfully requests that these rejections be withdrawn.

In addition, with respect to claims 9-10 the Examiner relies upon Anderson for teaching sending an indication to cache or not cache a received network address. The Examiner provides as motivation, "ensuring security in the network not to cache the user address or to cache the network address." Office Action, June 1, 2007, p.7. Applicant respectfully disagrees, because the provided motivation does not make sense. Cached information is information to which a user or client already has access, and caching simply provides a more efficient mechanism for accessing the information, or by not caching requires the retrieval of the most up to date information from the original source. There is no element of security in caching or not caching. Therefore, Anderson cannot be

combined with Ronen and Eftis for the reason the Examiner suggests. Accordingly, these claims are patentable over Ronen, Eftis, and Anderson for this additional reason.

III. Conclusion

Based upon these remarks and amendments, Applicant respectfully requests reconsideration of this application and its early allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-3265. Applicant believes all required fees are being paid in connection with this response. However, if an additional fee is due, please charge our Deposit Account No. 50-0665, under Order No. 323328003US from which the undersigned is authorized to draw.

Dated: 9/4/2007

Respectfully submitted,

By 

J. Mason Boswell

Registration No.: 58,388

PERKINS COIE LLP

P.O. Box 1247

Seattle, Washington 98111-1247

(206) 359-8000

(206) 359-7198 (Fax)

Attorney for Applicant